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Planning Research Corporation

**PRC Environmental Management, Inc.**

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August 7, 1989

Ms. Sue E. Hays  
Government Affairs Supervisor  
Rhone-Poulenc, Inc.  
9229 East Marginal Way South  
P.O. Box 80963  
Seattle, Washington 98108

Dear Ms. Hays,

As per our telephone conversations last week, PRC/EMI, under contract to the U.S. Environmental Protection Agency (EPA), is required to make a visual site inspection (VSI) of the Rhone-Poulenc, Inc., Marginal Way Facility, Seattle, Washington. This VSI is part of a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA). The RFA is part of the permitting process performed by the EPA and the Washington Department of Ecology (WDOE). However, in the case of Rhone-Poulenc, Inc., the RFA is a result of the company's intent to close the RCRA hazardous waste storage facility. A preliminary review of all files in EPA and WDOE offices regarding Rhone-Poulenc, Inc. has been performed as phase one of the RFA. Phase two of the RFA is the VSI.

PRC/EMI has been scheduled under an authorized work plan by EPA Region 10 to conduct this VSI on Wednesday, August 9, 1989. We would like to begin at 9:30 a.m. and allow the entire day for completion of the VSI. There will be two representatives from PRC/EMI, myself and Mr. James Pankanin. The VSI will include the following activities:

- talking to representatives of Rhone-Poulenc, Inc.,
- taking a walking tour of the entire Marginal Way facility to look at all Solid Waste Management Units (SWMUs) including, but not limited to such areas as the hazardous waste storage facility, process areas, tank farm area, laboratory, river bank areas and so forth,
- taking notes of the inspection,
- taking photographs of the facility both indoors and outdoors,
- taking air quality monitoring measurements throughout the facility during the inspection using a hand held monitor.

No samples other than the air quality monitoring will be taken during the VSI. If determined to be necessary, such sampling would be conducted under another later phase of the RFA.

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As per your request for specific information regarding PRC/EMI's authority to conduct this VSI of the RFA, the following information is provided:

- PRC/EMI has been designated as an authorized representative of the EPA for the purpose of conducting such RFA inspections pursuant to Section 3007 (a) of RCRA (please refer to attached EPA letter of credentials and designation).
- EPA regulations and policies governing confidentiality of business information (CBI) are set forth in Section 3007 (b) of RCRA, 42 U.S.C. 6927 and in Part 2 of Title 40 of the Code of Federal Regulations. PRC/EMI under Contract Number 68-W9-0009 (TES 12) has CBI security documents in place with EPA. For information please contact--  
Dina Villari  
RCRA Document Control Officer  
Information Management Staff (OS-312)  
Office of Solid Waste  
U.S. Environmental Protection Agency  
Washington, D.C. 20460
- PRC/EMI will conduct the VSI of the RFA in accordance with the EPA document RCRA Facility Assessment Guidance published by the EPA, Office of Solid Waste, Washington, D.C., October, 1986.

Thank you for your cooperation in arranging for PRC/EMI to conduct this VSI as part of the RFA process requirements. We look forward to meeting you and/or other company representative(s) at the Rhone-Poulenc, Inc., Marginal Way Facility on August 9, 1989.  
Thank you.

Sincerely,



Gary A. Bruno  
Geologist

cc: Wayne Pierre/EPA